

The Honorable John H. Chun

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO. 2:25-cv-00602-JHC

DECLARATION OF
PATRICIA COLE-TINDALL

I, PATRICIA COLE-TINDALL, declare as follows:

1. I am over the age of 18, competent to testify as to the matters herein, and make this declaration based on my personal knowledge.

2. I am the Sheriff for the Martin Luther King, Jr. County Sheriff's Office (KCSO).

3. I am a commissioned officer in the State of Washington and I have been a member of the KCSO Leadership Team since 2015. In 2022, I was appointed to the post of King County Sheriff. There are many positive aspects of my work as Sheriff, but one of the most challenging aspects is maintaining a level of service within the confines of the available budget. In addition to making sure we are competitive with other police agency salaries, we must also budget for all the tools, training and equipment that are necessary to provide law enforcement services in our community.

1 4. The KCSO employs over 1200 people and directly serves the law enforcement
2 needs of over half a million people in unincorporated areas of the County, as well as twelve cities
3 that contract with KCSO for police services. The KCSO also provides police services for the
4 Muckleshoot Tribe, Metro Transit, the King County International Airport, and offers secondary
5 support to the Seattle Police Department and other police agencies in the Puget Sound area.

6 5. Metro provides transit services throughout King County, with an average of
7 200,000 people boarding the coaches each day. Sound Transit covers an area that includes 53
8 cities. The County is bigger than the state of Rhode Island, encompassing more than 2,300 square
9 miles and more than 40% of Washington's population. Due to the concentration of coaches and
10 transit trains in downtown Seattle, the Sound Transit and Metro Police (who are KCSO
11 employees) work in partnership on a Joint Transit Anti-Terrorism Team (JTATT), which
12 provides visible deterrence and operations focused on terrorism and trains other employees on
13 proper response to mass casualty events.

14 6. Several major corporations are headquartered within King County, including
15 Microsoft, Amazon, Starbucks, and Costco.

16 7. There are multiple major league sports arenas in the County where Seattle's
17 National Hockey League team, National Football League team, Major League Baseball and
18 Major League Soccer teams compete. The Port of Seattle, a major west coast port, and the
19 SeaTac International Airport are also located within King County.

20 8. When we think about supporting public safety in the County, we must consider
21 not just our own County and contract agencies, but all the communities within the County where
22 we provide mutual aid for other public safety agencies. It is imperative that we have the budget
23 and the tools necessary to keep our community safe and to get the necessary training for our
24 personnel.

25 9. The KCSO funds its public safety services from three primary sources: the
26 County's general fund, contract city payments, and grants specific to public safety services.

1 10. Our County is experiencing some challenges in the next biennial budget due to
2 falling County tax revenues.

3 11. I have been asked to cut \$30.2 million over the next two years. To put that in
4 more concrete terms, this is the equivalent of approximately 80 full time deputy positions in our
5 agency.

6 12. With budget restrictions of this magnitude, it is critical that the KCSO receive
7 every dollar it has been awarded in public safety grants.

8 13. Our records reflect that there are no less than 14 grants awarded to KCSO by the
9 Department of Justice (DOJ) and the Department of Homeland Security (DHS). Each and every
10 grant provides funding for valuable public safety services.

11 14. KCSO was awarded multiple Urban Area Security Initiative (UASI) grants,
12 dating back to 2021, and received similar grants dating back to 2006. This means UASI funding
13 has been part of our budget for 19 years. The funds are awarded to assist high-threat, high-density
14 Urban Area efforts to build, sustain, and deliver the capabilities necessary to prevent, prepare
15 for, protect against, and respond to acts of terrorism.

16 15. This initially included funding for aviation aircrew training, joint agency drills
17 and the use of small unmanned aerial systems (SUAS). The SUAS are important incident
18 response and anti-terrorism tools. SUAS include specialized technology used to detect activity
19 where there is no ambient light. Our Air Support Unit can then detect criminal suspects who
20 would otherwise be difficult or impossible to see from the air space.

21 16. The remaining committed funds will be used to purchase robots that support the
22 protection of soft targets and crowded places, and protect our personnel in high-risk public safety
23 situations. For example, we can gather information about a volatile scene using a robot instead
24 of a person. Robots can also identify and remove improvised explosive devices. In a recent
25 incident, one of our detectives was shot during an eviction and we used a robot to gain entry to
26

1 the residence and provide visual access to the remaining deputies outside on the status of the
2 shooter.

3 17. If we do not receive the UASI funds, we are left with the dilemma of whether to
4 forgo the use of robot technology or cutting the funding for other equally important public safety
5 equipment in order to fund the robot purchase. In either case, public and officer safety suffers.

6 18. We are also using UASI funds to train and respond to activities involving
7 explosives. We have initiated the purchase of portable Xray machines that allow law
8 enforcement to Xray and see suspicious items, which has important applications in mass transit
9 locations policed by Metro and Sound Transit police. We also plan to utilize this technology as
10 one of several anti-terrorism tools during large regional events like the Federation Internationale
11 de Football Association (FIFA) World Cup event, scheduled for 2026, in King County.
12 Certainly, an event of this magnitude requires significant advance planning and purchase of
13 necessary equipment, including the mobile Xray machines which could be used at arenas and on
14 mass transit providing transportation to the events. Once again, we are faced with the decision
15 of whether to cancel an order for equipment that will benefit thousands of spectators attending
16 FIFA events or cutting the cost of other important public safety equipment.

17 19. Also based on a UASI award, we plan to purchase an armored vehicle for use in
18 high-risk scenarios like active shooter events or incidents involving explosives. An armored
19 vehicle provides protection for officers in the vehicle as they secure a position to neutralize an
20 active shooter. Additionally, this vehicle can be used to protect against an identified bomb threat
21 and for high-risk warrant and arrest service when the suspect(s) are known to be armed and/or
22 violent towards law enforcement and the community. The total of all outstanding UASI grant
23 funds awarded to KCSO is \$1,159,500 and some of the grants are funded through the end
24 of 2026.

25 20. We also planned our budget around grant funding to secure personnel and training
26 for crisis intervention. Grant funding from the DOJ will support the hiring of mental health

1 professionals (MHPs) to support the KCSO Crisis Intervention Team (CIT)/Co-Responder
2 program.

3 21. MHPs offer a specialized service that will assist the KCSO in de-escalation in
4 mental health encounters, resulting in increased officer and public safety. There are multiple
5 federal grants supporting this safety-based approach to crisis events.

6 22. We continue to utilize a DOJ grant for body-worn cameras, which provide critical
7 evidence for KCSO investigations into criminal conduct and also assists prosecutors making
8 charging decisions. While most of the commissioned patrol personnel now have cameras they
9 wear and many vehicles also have cameras, it is important to complete this project so that we
10 have agency-wide use of this technology.

11 23. Another DOJ grant awarded to the KCSO provides for rapid DNA technology.
12 The Rapid DNA technology can process DNA within 90 minutes, resulting in quick and accurate
13 identifications. Results can be checked with existing databases to determine if the suspect is
14 connected to other criminal conduct. For example, the DNA profile can be checked against
15 profiles from unsolved homicides, sexual assaults, kidnappings, and terrorism incidents. Because
16 of the speed of detection, it is possible this tool can actually prevent additional violent crimes. A
17 person can potentially be connected to another crime while in custody for the arrest which forms
18 the basis for collection of the DNA, so the hit against the database will form an additional basis
19 for detention.

20 24. The total of all outstanding DOJ and DHS grant funds awarded directly to KCSO
21 is \$3,967,154, and some of the grants are funded through the end of 2027. These are “pass
22 through grants.”

23 25. As the Chief Law Enforcement Officer for the entire County, I take seriously the
24 responsibility to fund the courageous work of our law enforcement team. They are deserving of
25 the best equipment and technology available to do this challenging work. I also believe this level
26 of funding helps us support the work of the federal law enforcement agencies that work closely

1 with KCSO. Our agency is an important partner for federal criminal investigations because our
2 deputies are authorized throughout our state to conduct criminal investigations and arrests under
3 state law.

4 26. The funding awarded to KCSO by Homeland Security and the DOJ is already
5 included in our operating budget. If we are not able to collect the funds awarded, there is
6 important equipment and public safety work that we will not be able to provide. My agency has
7 been asked to do more with less for several successive budgets and we do not have funding to
8 replace any of the funds we have relied upon from DOJ/DHS grants.

9 27. The grants awarded to KCSO and discussed in this declaration are used for
10 equipment training and personnel to support public and officer safety. The awarded grants are
11 not related to enforcement of federal immigration policy. Our agency enforces the criminal laws
12 of the State of Washington. KCSO is not engaging in conduct that obstructs federal immigration
13 policy in its operations.

14
15 I declare under penalty of perjury under the laws of the State of Washington and the
16 United States of America that the foregoing is true and correct.

17
18 DATED this 20th day of May 2025.

19
20 *Patricia Cole-Tindall*
21 PATRICIA COLE-TINDALL